

22cv10957

Ali Moore

06/30/25

DEFENDANT(S).

MOTION FOR PROTECTIVE ORDER (RULE)

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now Plaintiff, [Your Name], pro se (or through counsel, if applicable), and respectfully moves this Court, pursuant to Federal Rule of Civil Procedure 26(c), for a protective order to prevent the abstraction of justice and to address ongoing misinformation and confusion regarding the status of discovery in this matter. In support of this motion, Plaintiff states as follows:

I. STATEMENT OF FACTS

1. Abstraction of Justice by Counsel

Plaintiff has experienced what may be described as a “tempered abstraction of justice” by his attorney, Pablo. This phrase reflects Plaintiff’s belief that the attorney’s actions, or inactions, have clouded the integrity of the proceedings and may have compromised Plaintiff’s ability to obtain a fair and just resolution of this case.

2. Misinformation by the Court

Plaintiff has received misinformation from the Southern District of New York regarding the status of discovery. Specifically, during several recent phone calls, Plaintiff was told that discovery was not yet underway, despite indications to the contrary.

3. Harm to Plaintiff

This misinformation has caused Plaintiff unnecessary confusion and delay, and has impeded Plaintiff’s ability to prepare and present his case effectively.

4. Cases orchestrations, then misinformations about amending complaint , clear of a day so hold on discovery do not permit.

5. The cyber crimes on my phone contributed to this issue and lag on my computer.

II. LEGAL STANDARD

Federal Rule of Civil Procedure 26(c) provides that a court may, for good cause shown, issue a protective order to protect a party from annoyance, embarrassment, oppression, or undue burden or expense in discovery.

III. ARGUMENT

Plaintiff submits that the misinformation regarding the status of discovery and the abstraction of justice by his attorney constitute good cause for the issuance of a protective order. Plaintiff seeks the Court’s intervention to clarify the status of discovery and to ensure that all parties are

operating under accurate information. Plaintiff further requests that the Court take any necessary steps to safeguard the integrity of the proceedings.